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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE: * CASE NO. 17-20488
* CHAPTER 13
ALBERT BRUNO *
* HEARING DATE: Sept. 12, 2017
* TIME: 10:00 A.M.
Debtor(s) *
* CERTIFICATION IN OPPOSITION
* TO MOTION FOR RELIEF FROM
* THE AUTOMATIC STAY

The application of Albert Bruno, respectfully requests unto this Honorable Court as follows:

1. I am filing this certification in opposition to the motion for relief from the automatic stay filed by Bank of America, my first (and only) mortgagee.
2. On August 29, the Court entered an order allowing me to convert to a Chapter 13. I will be timely filing the Chapter 13 plan, which my attorney advises is due September 14, 2017.
3. Bank of America is my only creditor.
4. I feel behind in my mortgage payments because I was seriously injured at work. Eventually I received a disability pension from UPS, my former employer, and an award of Social

Security disability. These amounts are set forth in my Schedule I and total \$4,389.00 monthly.

5. The mortgage payment is \$3,260.00.

6. In July 2017 my wife began working. Prior to July 2017, my wife was a homemaker.

7. With my income and my wife's income, I and my attorney anticipate that I will be able to propose and complete a successful Chapter 13 plan.

8. Based upon the foregoing, I ask the Court to deny the motion for relief from the automatic stay.

/s/ Albert Bruno
ALBERT BRUNO

Dated: September 1, 2017